

ORC

REPORT ON INSPECTION TO DETERMINE  
COMPLIANCE WITH THE PCB DISPOSAL  
AND MARKING REGULATIONS

SATRA CONCENTRATES, INC.  
CO. RD. #74 GOULDS ROAD  
P. O. BOX 536  
STEUBENVILLE, OHIO 43952

DECEMBER 14, 1988

PERFORMED BY:

OHIO ENVIRONMENTAL PROTECTION AGENCY  
OFFICE OF EMERGENCY RESPONSE  
P.O. BOX 1049, 1800 WATERMARK DRIVE  
COLUMBUS, OHIO 43266-0149

AS AUTHORIZED UNDER THE  
U.S. EPA PILOT TSCA COOPERATIVE  
ENFORCEMENT AGREEMENT PROGRAM

EPA Region 5 Records Ctr.



388271

## PCB COMPLIANCE INSPECTION REPORT

### I. OBJECTIVES

The inspection was conducted to document the facility's handling, storage and disposal practices and to determine its compliance with the PCB Regulations, 40 CFR Part 761, as published in the Federal Register of May 31, 1979 and as amended.

### II. COMPANY IDENTIFICATION

Satra Concentrates, Inc.  
Co. Rd. #74 Goulds Road  
P.O. Box 536  
Steubenville, Ohio 43952

#### Responsible Official

Mr. Louis A. DiPaolo, Plant Manager

### III. DATE OF INSPECTION

December 14, 1988

### IV. PARTICIPANTS

#### Company

Mr. Louis A. DiPaolo, Plant Manager  
Mr. Abraham Zook, Maintenance Supervisor

#### Ohio EPA

Mr. Tom Buchan, Environmental Scientist II (Author)

### V. COMPANY BACKGROUND

(X) PCBs ( ) No PCBs discovered

The company began operations in December 1984 (established on "paper" as company in 1980) on the same site that was formerly occupied by Satralloy, Inc. The company reclaimed the alloy from slag remaining from Satralloy's manufacture of ferrochrome. The metal product was extracted from the slag and sold to speciality steel industries to be used in the

manufacture of stainless steel. The initial sale of the product was within a 50 mile radius (mainly Pittsburgh area). The property was still owned by Satralloy, Inc. and Satra Concentrates, Inc. leased approximately 2300 square yards out of a total 36 acres of buildings.

The parent company was Satra Corporation, 165 West Putnam Street, Greenwich, Conn. 06830.

VI. INSPECTION SUMMARY

Opening Conference

- A. The inspector(s) met with company officials as indicated in Section II, presented TSCA Inspection Credentials, explained the purpose of the inspection, and presented for signature the TSCA Inspection Forms as indicated below:

(X) Notice of Inspection  
(X) TSCA Confidentiality Notice  
( ) Receipt for Samples/Documents collected  
These documents are enclosed as Attachment A and B and were signed by Mr. Louis A. DiPaolo.

B. Circumstances Applicable to this inspection

( ) Disposal	( ) Processing
(X) Marking	( ) Distribution
( ) Storage	(X) Use/Authorizations
( ) Manufacturing	(X) Recordkeeping
( ) None of the Above	

C. CITATION (Attachment C)

( ) Not Applicable  
(X) Citation issued on December 14, 1988  
(X) Response received on December 23, 1988

D. Closing Conference

(X) The inspector explained the three possible outcomes of the inspection and informed the company officials that a final determination and notification would be made by the Regional Office.

VII. SAMPLES/PHOTOGRAPHS/DOCUMENTS

- ( ) None Taken  
(X) See Attachments as listed

VIII. ATTACHMENTS

- A. Notice of Inspection
- B. TSCA Inspection Confidentiality Notice
- C. Field Citation
- D. Facility Documents/Photographs

IX. INSPECTOR'S COMMENTS

\_\_\_\_\_ Disposal   X   Marking   X   Use/Authorizations  
\_\_\_\_\_ Storage   X   Recordkeeping \_\_\_\_\_ Manufacturing/  
Processing \_\_\_\_\_ Distribution \_\_\_\_\_ Other

When the company began operations in December 1984, it assumed ownership of five nameplated PCB transformers that had been owned by Satralloy, Inc.

- 1.) G.E. Pyranol, S/N C-503736, 500 gal.
  - located inside J1 Building, Sub 1A,
  - M<sub>L</sub> label on transformer, no M<sub>L</sub> label on two access ways,
  - no leaks;
- 2.) G.E. Pyranol, S/N C-505415, 505 Gal.
  - located inside J1 Building, Sub 1B,
  - M<sub>L</sub> label on transformer, no M<sub>L</sub> label on two access ways,
  - no leaks;
- 3.) G.E. Pyranol, S/N C-503735, 500 gal.
  - located inside J1 Building, Sub 3,
  - M<sub>L</sub> label on transformer, no M<sub>L</sub> label on access way,
  - no leaks;
- 4.) G.E. Pyranol, S/N C-856282, 500 gal.
  - located inside J1 Building, Sub 4, diked,
  - M<sub>L</sub> label on transformer, no M<sub>L</sub> label on access way,
  - no leaks;



- 5.) G.E. Pyranol, S/N C-503737, 500 gal.
- located inside J2 Building, Sub 21,
  - M<sub>L</sub> label on transformer, no M<sub>L</sub> label on access way;
  - no leaks.

The facility had not documented quarterly inspections from December 1984, to the time of inspection. Company officials stated they conducted weekly visual inspections of the transformers. In addition, the company had not maintained annual documents from 1984 to 1987 and they had not notified the local fire department regarding the five PCB transformers.

A Field Citation was issued to the company (Appendix C). The facility submitted recreated annual documents from 1984 to 1987, a letter of notification to the local fire department regarding the PCB transformers and photographs of PCB transformer access ways with M<sub>L</sub> labels (Appendix D).

Tom Buchanan 3/9/89  
Inspector's Signature Date

where  
are  
these  
very  
small  
you  
take  
these  
into  
account  
impairment

ATTACHMENT A



US ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved  
OMB No. 2070-0007  
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE 12/14/88	INSPECTOR NO. OH-021	DAILY SEQ. NO. 01	10:40	Satra Concentrates, Inc.
4. INSPECTOR ADDRESS Ohio EPA/Office of Emergency Response P.O. Box 1049 Columbus, Ohio 43266-0149				5. FIRM ADDRESS Co. Rd. #74 Goulds Rd. P.O. Box 536 Steubenville, Ohio 43952

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act:

- ☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to (Check appropriate blocks):

☐ A. Financial data

☐ D. Personnel data

☐ B. Sales data

☐ E. Research data

☐ C. Pricing data

The nature and extent of inspection of such data specified in A through E above is as follows:

INSPECTOR SIGNATURE <i>Thomas P. Buchan</i>		RECIPIENT SIGNATURE <i>L. A. Di Paolo</i>	
NAME Thomas P. Buchan		NAME Louis A. Di Paolo	
TITLE Environmental Scientist	DATE SIGNED 12/14/88	TITLE Plant Manager	DATE SIGNED 12/14/88

ATTACHMENT B





## TSCA INSPECTION CONFIDENTIALITY NOTICE

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE 12/14/88	INSPECTOR NO. OH-021	DAILY SEQ. NO. 01	Satra Concentrates, Inc
3. INSPECTOR NAME Thomas P. Buchan			4. FIRM ADDRESS Co. Rd. # 74 Goulds Road P.O. Box 536 Steubenville, Ohio 43952
5. INSPECTOR ADDRESS Ohio EPA/Office of Emergency Response P.O. Box 1049 Columbus, Ohio 43266-0149			6. CHIEF EXECUTIVE OFFICER NAME Mr. L. A. DiPaolo
			7. TITLE Plant Manager

## TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.

2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

Danielle Livinghouse  
U.S. EPA Region II  
230 South Dearborn St.  
Chicago, IL 60604

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:		If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.	
I have received and read the notice			
SIGNATURE L. A. DiPaolo		NAME	
NAME Louis A. DiPaolo		TITLE	
TITLE Plant Manager		ADDRESS	
DATE SIGNED 12/14/88			

ATTACHMENT C



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF.

FIELD CITATION

Satra Concentrates, Inc  
Facility Name

Co. Rd. #74 Grafton, IL P.O. Box 536

St. Julienville, Ohio 43952  
Facility Address City, State

\* \* \*

Compliance Inspection  
Date:

12/14/88

This is a formal notification concerning the compliance inspection conducted at the facility named above, pursuant to Section II of the Toxic Substances Control Act (TSCA), 15 U.S.C. Section 2601 et seq. The purpose of the inspection was to assess the facility's compliance with the requirements of the Polychlorinated Biphenyls (PCB) Final Rule, 40 C.F.R. Part 761, and amendments.

Issuance of this citation and receipt of any documentation does not preclude the U.S. EPA from proceeding under TSCA or any other applicable statute and assessing appropriate penalties. Any enforcement action taken by the U.S. EPA after a final evaluation of the inspection report would not be limited to the violations listed in this citation.

It appears that the above-named facility was not in compliance with the requirements of 40 C.F.R. Part 761. The inspection revealed the following violations:

1. ☒ AUTHORIZATIONS  
(Use 761.30)

2. ☒ MARKING  
(761.40)

3. ☐ STORAGE  
(761.65)

4. ☒ RECORDKEEPING  
(761.180)

5. OTHER \_\_\_\_\_



Comments On Violations Cited Above

Authorizations: Sec 761.30(a)(1)(vi) - Facility did not  
registered five nameplate PCB transformers with local  
fire personnel;

Sec 761.30(a)(1)(ix) - Facility did not maintain quarterly  
inspection records on five nameplate PCB transformers  
from Dec. 1984 to Dec 14, 1988

Record Keeping: Sec 761.186(a) Facility did not maintain  
PCBs Annual records for five nameplate PCB transformers  
from 1984 to 1987

Access: Sec 761.40 - Facility did not have access ways  
marked with M<sub>2</sub> label for five nameplate  
PCB transformers

CITATION

DOCUMENTATION REQUIRED TO CORRECT THE ABOVE VIOLATION(S)

- ① Sec 761.30(a)(1)(vi) - PCB transformer registration letter  
with fire response personnel
- ② (xii) - construction of records of inspection to  
show that inspections and maintenance history  
are maintained
- ③ Sec 761.40 - Photographs showing areas to PCB  
areas have been worked
- ④ Sec 761.180(a) - Reconstruction of all PCB Annual Reports  
for 1984 to 1987

Within thirty (30) days of receipt of this Field Citation this facility must submit the requested documentation to show that the violation(s) has/have been corrected. The documentation must be submitted to:

Inspector's Name Tom Buchan

Address Ohio EPA/Office of Emergency Response  
P.O. Box 1049

City, State Columbus, Ohio 43266-0149

If you have questions concerning this inspection or this Field Citation, please call the inspector at (614) 644-2260.

L.A. DiPardo 12/14/88 Thomas P. Buchan 12/14/88  
Issued To/Received By Date Inspector's Signature Date



ATTACHMENT D



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

FIELD CITATION

Satra Concentrates, Inc.

Facility Name

Co. Rd. #74 Goulds Rd. P.O. Box 536

Compliance Inspection  
Date:

Steubenville, Ohio 43952

Facility Address

City, State

12/14/88

\* \* \*

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1. ☒ AUTHORIZATIONS  
(Use 761.30)

2. ☒ MARKING  
(761.40)

3. ☐ STORAGE  
(761.65)

4. ☒ RECORDKEEPING  
(761.180)

5. OTHER \_\_\_\_\_



ATRALLOY INC.

MEMBER OF THE SATRA GROUP

December 20, 1988

CERTIFIED MAIL

Mr. Ray Vogt  
New Alexander Volunteer Fire Dept.  
Rd. No. 1  
Mingo Junction, Oh. 43938

Dear Sir:

This letter of notification serves to inform you that in case of an emergency at the Satralloy/Satra Concentrates, Inc. plant facility, located on County Road 74, in Crosscreek Township that some transformers and capacitors are contaminated with PCB. Those areas of contamination are duly marked with M<sub>I</sub> labels.

This notification is in accordance with Final Rule, 40 C.F.R. Part 761.30 (a)(1)(vi).

Sincerely,

Louis A. DiPaolo  
Plant Manager

SATRA CONCENTRATES, INC.  
QUARTERLY INSPECTION REPORT  
QUARTER, 19

INSPECTION DATE: \_\_\_\_\_  
 INSPECTED BY: \_\_\_\_\_

<u>ITEM NO.</u>	<u>DESCRIPTION</u>	<u>CONDITION(CIRCLE)</u>	<u>REMARKS</u>
1	1500 KVA Transformer - Unit Substation #1	Good Fair Bad	
2	1000 KVA Transformer - Unit Substation #1A	Good Fair Bad	
3	1500 KVA Transformer - Unit Substation #3	Good Fair Bad	
4	1500 KVA Transformer - Unit Substation #4	Good Fair Bad	
5	1500 KVA Transformer - Unit Substation #21	Good Fair Bad	

SATRALLOY, INC.  
QUARTERLY INSPECTION REPORT  
QUARTER, 19

INSPECTION DATE: \_\_\_\_\_  
 INSPECTED BY: \_\_\_\_\_

1	1000 KVA Transformer - Unit Substation #2	Good Fair Bad	
2	1500 KVA Transformer - Unit Substation #22	Good Fair Bad	
3	112 High Voltage Capacitors - Main Substation Yard	Good Fair Bad	Two (2) Broken Insulators
4	60 High Voltage Capacitors - Plant No. Service Floor	Good Fair Bad	
5	3 High Voltage Capacitors - Furnace No. 3 Transformers	Good Fair Bad	



SATRA CONCENTRATES, INC.  
P C B INVENTORY ANNUAL REPORT  
YEAR - 1984

DATE: 12-20-88

ITEM NO. 1 - 1500 KVA Transformer - Unit Substation #1

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 2 - 1000 KVA Transformer - Unit Substation #1A

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 505 Gal., 6600 Lbs.

ITEM NO. 3 - 1500 KVA Transformer - Unit Substation #3

Location - Plant No. 1, Service Floor

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 4 - 1500 KVA Transformer - Unit Substation #4

Location - Pumphouse

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 5 - 1500 KVA Transformer - Unit Substation #21

Location - Plant No. 2, Paste Floor

PCB - 500 Gal., 6500 Lbs.

Signed L. J. DiPaolo  
Title Plant Manager



SATRA CONCENTRATES, INC.  
P C B INVENTORY ANNUAL REPORT  
YEAR - 1985

DATE: 12-20-88

ITEM NO. 1 - 1500 KVA Transformer - Unit Substation #1

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 2 - 1000 KVA Transformer - Unit Substation #1A

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 505 Gal., 6600 Lbs.

ITEM NO. 3 - 1500 KVA Transformer - Unit Substation #3

Location - Plant No. 1, Service Floor

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 4 - 1500 KVA Transformer - Unit Substation #4

Location - Pumphouse

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 5 - 1500 KVA Transformer - Unit Substation #21

Location - Plant No. 2, Paste Floor

PCB - 500 Gal., 6500 Lbs.

Signed

Title

*L. J. DiLeo*  
*Plant Manager*

SATRA CONCENTRATES, INC.  
P C B INVENTORY ANNUAL REPORT  
YEAR - 1986

DATE: 12-20-88

ITEM NO. 1 - 1500 KVA Transformer - Unit Substation #1

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 2 - 1000 KVA Transformer - Unit Substation #1A

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 505 Gal., 6600 Lbs.

ITEM NO. 3 - 1500 KVA Transformer - Unit Substation #3

Location - Plant No. 1, Service Floor

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 4 - 1500 KVA Transformer - Unit Substation #4

Location - Pumphouse

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 5 - 1500 KVA Transformer - Unit Substation #21

Location - Plant No. 2, Paste Floor

PCB - 500 Gal., 6500 Lbs.

Signed *L. P. D. Gable*  
Title *Plant Manager*

SATRA CONCENTRATES, INC.  
P C B INVENTORY ANNUAL REPORT  
YEAR - 1987

DATE: 12-20-88

ITEM NO. 1 - 1500 KVA Transformer - Unit Substation #1

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 2 - 1000 KVA Transformer - Unit Substation #1A

Location - Plant No. 1, Ground Floor, Shipping Room

PCB - 505 Gal., 6600 Lbs.

ITEM NO. 3 - 1500 KVA Transformer - Unit Substation #3

Location - Plant No. 1, Service Floor

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 4 - 1500 KVA Transformer - Unit Substation #4

Location - Pumphouse

PCB - 500 Gal., 6500 Lbs.

ITEM NO. 5 - 1500 KVA Transformer - Unit Substation #21

Location - Plant No. 2, Paste Floor

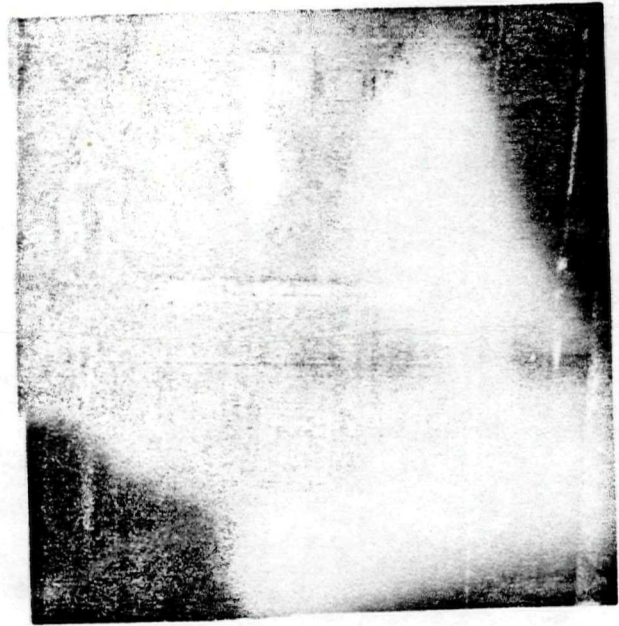
PCB - 500 Gal., 6500 Lbs.

Signed *L. J. Vitale*  
Title *Plant Manager*

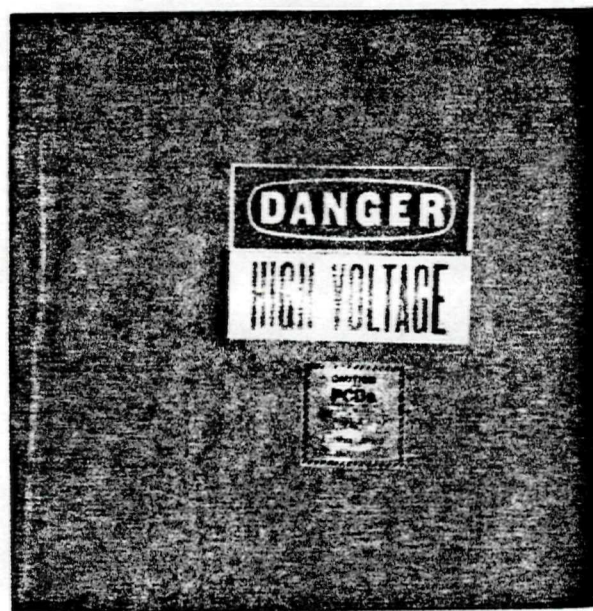




Unit Substation No. 4



Unit Substation No. 4



Unit Substation No. 21